IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO

IN RE:	)	Case No. 16-32776-maw
Douglas P. Fay,	)	Chapter 13
	)	Judge Maryann Whipple
	)	**MOTION TO CONVERT CASE TO CHAPTER 7 FROM CHAPTER 13**
Debtor	)	
	)	
		Matthew B. Bryant (0085991)
	)	Of Counsel
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	)	Attorney for Debtor

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NOW COMES the Chapter 13 Debtor, Douglas P. Pay, by and through his undersigned counsel, who hereby requests an order converting this case from Chapter 13 to Chapter 7. For cause, as previously referenced, Debtor has been considering a conversion in this case to allow for liquidation of estate assets. Due to the denial of the Rule 60(B) motion in state court and due to limited income of the Debtor, Debtor requests that this Court convert his case to Chapter 7 pursuant to 11 USC § 1307(a). Furthermore, debt limits are now a concern. The case was filed on September 1, 2016 as a Chapter 13 case. The case has not been previously converted.

WHEREFORE, for the foregoing reasons, Debtor requests that this Honorable Court convert this case from Chapter 13 to Chapter 7.

Respectfully submitted,

/s/ Matthew B. Bryant
Matthew B. Bryant, Esq.
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Convert Case from Chapter 13 to Chapter 7 has been served upon the following parties, this 7 October 2016 by regular U.S. mail and/or Electronic Mail as indicated herein:

Via Electronic Mail:

16-32776-maw Notice will be electronically mailed to the U.S. Trustee, and:

Andrea M. Brown on behalf of Interested Party David E Bowers
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Matthew B. Bryant on behalf of Debtor Douglas P. Fay
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Via Ordinary Mail:

See attached mailing matrix.

/s/Matthew B. Bryant
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